Securities Trading Policy

Date: 20 February 2026

1. Purpose

The purpose of the Securities Trading Policy is to ensure appropriate governance of the trading in the Cash Converters International Limited Securities (**Securities**) and other financial products of Cash Converters International Limited (the Company), compliance with the insider trading laws under the Corporations Act 2001 (Cth) (**Corporations Act**), protect the reputation of the Company in relation to trading in Securities, and prohibit specific types of transactions which are not in accordance with market expectations or may otherwise give rise to reputational risk.

2. Scope

This policy applies to all Directors, employees and Key Consultants or Key Contractors of the Company and its subsidiaries (together **Representatives**).
Additional trading restrictions are imposed on Directors, Senior Executives including Key Management Personnel (**KMP**), other Executive Officers, the Senior Leadership Team (**SLT**) and their Associated Parties (together **Officers**).

The following will generally be considered to be 'an Associated Party' of Representatives or Officers and be subject to the additional restrictions for the purpose of this Policy:

- immediate or close family members of Officers (for example, a partner or spouse or de facto spouse, children or parents) and any other immediate family members where the Officer has control over their investment decisions;
- any company, trust, managed superannuation fund or other entity that is controlled by Officers or an immediate family member of an Officer referred to above; and
- in relation to Directors only, any other person or entity where dealing in the Company's Securities by that person or entity would require disclosure to the ASX by the Director. This includes where the Director:
  - i) controls the right to vote or dispose of the Company's Securities; or
  - ii) is entitled to benefit from a contract to call for, or deliver the Company's Securities.

3. Policy

3.1 General Restrictions when in Possession of Inside Information

All Representatives are prohibited from:

a) Dealing in any Securities where the person dealing in the Securities has inside information in relation to those Securities; and
b) Passing on inside information to others who may deal in Securities.

Details of the insider trading laws are included in **Annexure A**. It is the responsibility of each Representative, prior to dealing in Securities, to consider carefully whether they possess inside information that may preclude dealing at that time and, if in doubt, should refrain from dealing.

3.1.1 Blackout Periods

Restrictions on dealing by Representatives in the Company Securities during Blackout Periods apply.

Subject to the below, given the heightened risk of actual or perceived insider trading all Representatives and their Associated Parties (and any other persons nominated by the Board from time to time) must not deal in the Company's Securities during the following periods (together **Blackout Periods**):

a) From the close of trading on ASX on 31 December each year to the opening of market the business day following the release of the Company's half yearly accounts to the ASX;
b) From the close of trading on ASX on 30 June each year to the opening of Market the business day following the release of the Company's preliminary annual accounts to the ASX; and
c) from the close of trading on ASX two weeks prior to the date of the Company's annual general meeting (**AGM**) to the opening of the ASX on the business day following the date of the AGM; and
d) Any other period determined by the Board from time to time to be a Blackout Period.

The Company Secretary will notify all Representatives of the opening and closing date of all **Blackout Periods**.

The above restrictions on Representatives and their Associated Parties dealing in the Company's Securities during any Blackout Periods are in addition to any Project Restrictions on dealing in the Company's Securities that may be imposed by the Board from time to time under this Policy.

3.1.2 Exceptions to Blackout Periods in Exceptional Circumstances

Subject to compliance with the applicable insider trading laws at all times, the only exception to the prohibition on dealing during Blackout Periods and any Project Restrictions is a sale of the Company's Securities, which will be permitted only if the processes outlined in section 3.2.1, 3.2.3 and 3.2.4 have been completed, and the Company Secretary has confirmed in writing that there is no known reason to preclude dealing, and one of the following exceptions apply:

i) prior written approval to deal has been given in writing by the Chair (or, in the case of the Chair or an Associated Party of the Chair, with the prior written approval of the Chair of the Audit and Risk Committee) to the Company Secretary where the Chair (or the Chair of the Audit and Risk Committee where applicable) is satisfied that:
   - the Representative or an Associated Party is facing severe financial hardship, such that a sale of their Securities is the only reasonable option available to resolving the hardship;
   - the Representative or an Associated Party is required by a final court order or enforceable court undertaking to sell or otherwise transfer the Company's Securities to a third party; or
   - the Representative or an Associated Party has identified another exceptional circumstance where the dealing by a Representatives or their Associated Parties of their Securities is the only reasonable option available to resolve the circumstance; or

ii) if the dealing does not involve a change in beneficial ownership and does not require disclosure to the ASX.

Where consent to deal is requested under section 3.1.2(i) above, the Representative or their Associated Party must provide documentary evidence to the Company Secretary, who will consult with the Chairman (or in the case of the Chairman or an Associated Party of the Chairman, with the Chair of the Audit and Risk Committee).

Where approval is obtained under this section 3.1.2, an order for the dealing must be lodged or otherwise authorised by the Representative or their Associated Party(ies) or, in the case of an off-market transaction, settled, within five clear trading days and the dealing must otherwise comply with the terms of this policy and applicable insider trading laws. Approval may be given by the CEO & Managing Director or Chair to extend the approval period if required provided the Representative or their Associated Party confirmed they are not in possession of inside information during the approval of the extension.

For the purpose of this section 3.1.2, if the approval is given before, during or after trading on one day, the order for the dealing must be lodged or otherwise authorised by the Representative or their Associated Party(ies) or, in the case of an off-market transaction, settled, before the close of trading on the fourth trading day after the approval is given (i.e. the approval day is included in the five day period).

Any Representative who is in possession of inside information must not deal in the Company's Securities and must take all reasonable steps to ensure that their Associated Parties do not deal in the Company's Securities, even if an exception to the Blackout Period or Project Restrictions applies and approval has been obtained under this section 3.1.2.

3.1.3 Additional Project Restrictions

From time to time, additional project restrictions on dealing in the Company's Securities (**Project Restrictions**) may also be imposed, by the Board, on some Representatives due to their knowledge of a potential project or transaction. The Board may delegate to the CEO & Managing Director to approve any Project Restrictions as required. The Company Secretary will advise the relevant Representatives if any Project Restrictions apply to them. The Company Secretary will advise all relevant Representatives once the Project Restrictions no longer apply in accordance with instructions from the Board or the CEO & Managing Director. Any restriction communicated by the Company Secretary under this section 3.1.3 must be kept strictly confidential.

No Representatives may deal in the Securities of another entity where they possess inside information about that entity obtained through their role or relationship with the Company.

3.2 Additional Trading Restrictions Applicable to Officers and their Associated Parties

The following additional trading restrictions will apply to the Officers and their Associated Parties (**Trading Restrictions**).

3.2.1 Process for Dealing in Securities by Officers

Without limiting the other provisions of this policy, Officers must complete the following steps if they, or their Associated Parties, wish to deal in the Company's Securities at any time, including a dealing of the type described in section 1 of **Annexure A**:

a) advise the Company Secretary of:
   i) their intention to deal in the Company's Securities; or
   ii) the intention of one of their Associated Parties to deal in the Company's Securities,
   iii) the details of the type of dealing and the number of Securities involved.
   By completing the Securities Trading Request Template available on the Company's intranet.
b) confirm to the Company Secretary that the Officer or their Associated Parties do not hold inside information, and the proposed dealing is not subject to any other restriction under this policy;
c) await written advice from the Company Secretary (which may be given by email) confirming that there is no known reason to preclude the dealing in the Company's Securities;
d) order/authorise/settle the dealing in the Company's Securities within five clear trading days of receiving confirmation from the Company Secretary under section 3.2.1(c); and
e) following completion of the dealing by the Officer or their Associated Parties, confirm to the Company Secretary that the transaction has occurred and provide the Company Secretary with a copy of the confirmation documentation for the transaction.

For the purpose of section 3.2.1(d) above, if the approval is given before, during or after trading on one day, the order for the dealing must be lodged or otherwise authorised by the Officer or their Associated Party(ies) or, in the case of an off-market transaction, settled, before the close of trading on the fourth

trading day after the approval is given (i.e. the approval day is included in the five day period). Approval may be given by the CEO & Managing Director or Chair to extend the approval period if required provided the Officer or their Associated Party confirms they are not in possession of inside information prior to approval for the extension being granted.

For the avoidance of doubt, a person seeking authorisation to deal cannot be their own 'authorising officer'.

3.2.2 Dealings by Associated Parties

Officers must take all reasonable steps to ensure that their Associated Parties do not deal in Company Securities without the Officer obtaining approval under this Policy.

3.2.3 Conditions of Clearance

With respect to any clearance to deal in the Company's Securities requested under section 3.2.1 above:

a) clearance can be given or refused at the discretion of the Company Secretary, CEO & Managing Director or Chair, without giving reasons;
b) clearance can be withdrawn by the Company Secretary, CEO & Managing Director or Chair at any time prior to the order for dealing being lodged or otherwise authorised, if new information comes to light or there is a change in circumstances;
c) the decision, as advised by the Company Secretary, to provide or deny clearance for a requested dealing is final and binding on any Officers seeking approval, whether on behalf of Officers or an Associated Party; and
d) if clearance to deal is refused, the Officers seeking the clearance must keep that information confidential and not disclose it to anyone (other than the Associated Party where relevant, and the Officers must ensure that the Associated Party keeps such information confidential).

Even if approval has been obtained under section 3.2.1 above, any Officers who subsequently comes into possession of inside information prior to dealing must not deal in the Company's Securities and must take all reasonable steps to ensure that their Associated Parties do not deal in the Company's Securities. Clearance to deal under this policy is not an endorsement of the proposed trade and any Officers or Associated Party dealing in Securities is individually responsible for their investment decisions and their compliance with insider trading laws.

3.2.4 Company Secretary Approval Process

Before advising the Officers that there is no known reason to preclude trading in the Company's Securities under section 3.2.1 above, the Company Secretary must confirm that statement with the Chair and/or CEO & Managing Director, where the dealing involves an Officer or their Associated Parties other than the Chair or CEO & Managing Director. Where the dealing involves the Chair or CEO & Managing Director or their Associated Parties, then the Company Secretary will confirm the statement with the Chair of the Audit and Risk Committee.

The Company Secretary will maintain copies of all requests for approvals to deal and details of all dealings in the Company's Securities made by persons covered by this policy.

3.2.5 Additional Obligations on Directors and ASX Disclosures

Directors must also comply with:

a) all requirements in the Corporations Act and the ASX Listing Rules in relation to notification of trading in the Company's Securities; and
b) the agreement entered into between each Director and the Company relating to notification of trading in the Company Securities.

In accordance with section 205G of the Corporations Act, a Director must notify the ASX within 5 business days after any change in the Director's relevant interest in Securities of the Company or a related body corporate of the Company.

A Director must notify the Company Secretary in writing of the requisite information for the Company Secretary to make the necessary notifications to ASIC and ASX as required by the Corporations Act and the ASX Listing Rules. For the purposes of this policy, information in writing includes a letter or an email.

4. Trading not Subject to this Policy

Subject to the insider trading prohibitions outlined above, the following is excluded from the operation of sections 3.1.1, 3.1.2 and 3.2 of this Policy:

- transfers of Securities of the Company already held into a self-managed superannuation fund or other saving scheme in which the Officers or Associated Parties is a beneficiary, subject to notify the Company Secretary in advance of the transfer;
- an investment in, or trading in units of, a fund or other scheme (other than a scheme investing only in the Securities of the Company) where the assets of the fund or other scheme are invested at the discretion of a third party;
- a disposal of Company Securities arising from the acceptance of a takeover offer, scheme of arrangement or equal access buy-back;
- trading under an offer or invitation made to all or most of the security holders, such as a rights issue, a security purchase plan, a dividend or distribution reinvestment plan and an equal access buy back, where the plan that determines the timing and structure of the offer have been approved by the Board. This includes decisions relating to whether or not to take up the entitlements and the sale of entitlements required to provide for the take-up of the balance of entitlements under a renounceable pro rata issue;
- the application for, and acquisition of, the Company's Securities under a Company employee incentive scheme or the exercise (but not the sale of Securities following exercise) of an option or a right under an employee incentive scheme or the conversion of a convertible security, where the final date for the exercise of the option or right, or the conversion of the security, falls during a Blackout Period or Project Restriction; and
- the acquisition of the Company's Securities by the Employee Share Trust when acting under 'Set and Forget' instructions approved by the Board if the acquisition of shares occurs during a Blackout Period or Project Restrictions.

Any dealings by Officers and their Associated Parties remain subject to insider trading laws, regardless of any exemption outlined above.

5. Short Term Trading

Notwithstanding the following, Officers and their Associated Parties may never engage in short term trading of any Company Securities. In general, the purchase of Securities with a view to resale within a 12-month period and the sale of Securities with a view to repurchase within a 12-month period would be considered to be transactions of a "short term" nature. However, the sale of shares after they have been acquired through the conversion of a security (e.g. exercise of an option or right) will not be

regarded as short term trading provided that the combined periods over which the security and resulting Shares were held exceeds 12 months.

6. No Hedging

Officers and their Associated Parties may not enter into transactions or arrangements which operate to limit the economic risk of their holdings of Company Securities (known as Hedging) at any time during which those Securities are subject to the hedging prohibitions specified in the Corporations Act (section 206J of the Act). Section 206J refers to KMP and specified hedging prohibitions in relation to:

"remuneration that:

a) has not vested in the member; or

b) has vested in the member but remains subject to a holding lock."

At all other times, Officers or their Associated Parties may not enter into such an arrangement without the prior consent of the Chair of the Board, before commencing the transaction. Officers must also provide the Chair of the Board in with subsequent confirmation of the transaction that has occurred. No prior consent is required prior to an Officer's participation in a Dividend Reinvestment Plan. Generally speaking, Hedging is discouraged and is explicitly prohibited in relation to any Securities-based remuneration plan or scheme operated by the Company, during the period prior to any resulting Shares becoming unrestricted.

7. No margin lending or granting security interests

Officers and their Associated Parties may not at any time:

a) directly or indirectly, grant any form of security (whether by way of charge, mortgage, pledge or otherwise) over any Company Securities which are unvested or subject to a holding lock, to secure any obligation of that Officer or Associated Party or any third party or enter into any margin lending arrangement involving Company Securities.

Unless paragraph 7 (a) applies, Officers and their Associated Parties may, directly or indirectly, grant any form of security (whether by way of charge, mortgage, pledge or otherwise) over any Company Securities, to secure any obligation of that Officer or Associated Party or any third party or enter into any margin lending arrangement involving Company Securities, where approval has been obtained under section 3.2.

8. Breaches

Strict compliance with this policy and the insider trading laws is a requirement under each employment contract within the Company and the terms of appointment of each director. Breach of the insider trading laws can result in serious consequences, including exposing the Company and individuals to penalties and third-party claims. Individuals may also be subject to significant fines and imprisonment. Breaches of this policy or the insider trading laws will result in disciplinary action, which may include dismissal.

9. General

The requirements of this policy are separate from, and in addition to, the legal prohibitions in the Corporations Act on insider trading.

10. Queries

If you have any questions regarding this policy, or whether a transaction you are considering may be captured by one of the provisions outlined above, please contact the Company Secretary.

11. Review of Policy

This Policy will be periodically reviewed, revised and re-published where necessary, to ensure it remains relevant and appropriate to the Company's activities.

If the Company makes a material change to this trading policy, the amended trading policy will be provided to the ASX for release to the market within 5 business days of the material changes taking effect.

This policy cannot be amended without approval from the Board.

Annexure A

Background to Insider Trading laws and Policy Exemptions

1. Definitions

For the purpose of this policy:

a) **dealing** includes:
   i) buying or otherwise applying for securities (including applying to participate in the Company's share plan), whether on-market or off-market;
   ii) selling or otherwise disposing of securities, whether on-market or off-market;
   iii) exercising options over securities;
   iv) creating a hedge, security interest, margin loan or other financial interest over or in relation to securities;
   v) transferring legal ownership of securities, even where beneficial ownership does not change;
   vi) any other transfer or creation of an interest in securities, whether directly, or by arranging for someone else to undertake the dealing on your behalf; and
   vii) agreeing or applying to do any of the above.

   In the case of an on-market trade, the dealing occurs at execution (but not settlement) of the trade. In the case of an off-market trade, the dealing occurs at settlement of the trade.

b) **inside information** means information that:
   i) is not generally available; and
   ii) if it were generally available, a reasonable person would expect it to have a material effect on the price or value of securities. This is satisfied where the information would, or would be likely to, influence investors in deciding whether to buy or sell securities.

c) **Key Consultant or Key Contractor** means a key or senior contractor or consultant who at the time is engaged by or providing services to the Company or its subsidiaries and whose contract specifies they must comply with Company policies.

d) **securities** includes shares, options, notes, bonds and other debentures, interests in managed investment schemes, trusts and other financial products, and any derivatives of those securities, including equity swaps, contracts for difference, futures, hedges and exchange-traded or over-the-counter options, whether settled by cash or otherwise.
   Portfolio products that are not specific to the Company, such as an index or broad-based superannuation fund, are not "securities" for the purpose of this policy.

2. Insider Trading Laws

a) If a person has inside information in relation to the Company's securities or other securities which is not publicly known, it is a criminal offence to:
   i) deal in those securities;
   ii) advise or procure another person to deal in those securities; or
   iii) pass on inside information to someone else where the person who has the inside information knows, or should reasonably have known, that the person receiving the information would use that information to deal in, or procure someone else to deal in, those securities.

b) Liability for breach of the insider trading laws can include:
   i) significant fines and/or imprisonment;
   ii) civil liability, which may include being sued by another party or the Company, for any loss suffered as a result of illegal dealing in securities; and
   iii) reputational damage, which may occur even where an insider trading breach is not proven.

The Australian Securities and Investment Commission (**ASIC**) monitors trading activity, including around the time of Australian Securities Exchange (**ASX**) announcements and significant share price movements.

c) The following factors should be considered to assist in determining whether information might be inside information, and whether passing on information may be a breach of the insider trading laws:
   i) It does not matter how a person comes to know the inside information, including whether it was obtained in the course of carrying out their responsibilities at work, or in passing in the corridor, or in a lift or at a dinner party.
   ii) The financial impact of the information may be important in determining if it is market sensitive, but strategic and other matters may also be important in determining whether information might influence investors to buy or sell those securities, and accordingly, might influence whether the information is inside information.
   iii) Information is inside information if it would, or would be likely to, influence investors in deciding whether to buy or sell securities, and can include information which is of an uncertain nature, rumours, matters of supposition, matters relating to the intentions of a person (including the Company) and information which is insufficiently definite to warrant disclosure to the public.
   iv) The restriction on passing on information means that inside information must not be passed on to colleagues, family, friends, contractors or others where that person might deal in those securities.
   v) The laws on insider trading can apply to dealings by entities and people associated with you (even if they are not employed by the Company), such as:
      - a company, trust or a managed superannuation fund that you control; and
      - a spouse, partner or dependent child.

Someone who is in possession of inside information may become subject to an insider trading investigation if an associate deals in securities to which the inside information relates.

3. Examples of Inside Information

The following list is illustrative only and is not exhaustive. Inside information could include:

a) possible acquisition or sale of any assets or business by the Company;
b) the financial performance of the Company against its budget or forecasts;
c) senior management or board changes;
d) a proposed dividend;
e) a possible change in the Company's capital structure; or
f) a possible claim against the Company or other unexpected liability.

4. The "Front Page" Test

It is important that public confidence in the Company is maintained. It would be damaging to the Company's reputation if the market or the general public perceived that directors or employees might

be taking advantage of their position in the Group to make financial gains by dealing in securities based on inside information.

As a guiding principle, director or employee considering dealing in securities should ask themselves: *If the market was aware of all the current circumstances, could the proposed dealing be perceived by the market as taking advantage of my position in an inappropriate way? How would it look if the transaction were reported on the front page of the newspaper? (the "**front page**" test).*

If any director or employee is unsure, they should consult the Company Secretary.

Where any approval under this Policy is required for a dealing, approval will not be granted where the dealing would not satisfy the "front page" test.